

Eric W. Moran, Esq.  
Theodora McCormick, Esq.  
Lauren B. Cooper, Esq.  
**EPSTEIN BECKER & GREEN, P.C.**  
875 Third Avenue  
New York, New York 10022  
(212) 351-4500 (phone)  
(212) 878-8600 (fax)

150 College Road West, Suite 301  
Princeton, New Jersey 08540  
(609) 455-1540 (phone)  
(609) 228-5318 (fax)

*Attorneys for Defendant  
Bank of Hope*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

SUK JOON RYU, a/k/a James S. Ryu,

Plaintiff,

v.

BANK OF HOPE,

Defendant.

Civil Action No.: 2:19-18998 (KM) (JBC)

*Document Electronically Filed*

**DECLARATION OF  
ERIC W. MORAN, ESQ.**

**FILED UNDER SEAL**

I, Eric W. Moran, Esquire, hereby declare as follows:

1. I am an attorney-at-law of the State of New Jersey and a Member of the Firm of Epstein Becker & Green, P.C., attorneys for Defendant Bank of Hope

in this matter. I make this Declaration in support of Defendant's Motion for Summary Judgment on Count I of the Complaint.

2. I have firsthand knowledge of the facts set forth in this Declaration.

3. Attached hereto as **Exhibit 1** is a true and correct copy of the August 8, 2007 Offer of Employment to Miye "Karen" Chon.

4. Attached hereto as **Exhibit 2** is a true and correct copy of the January 22, 2014 Email from Bo Young Lee.

5. Attached hereto as **Exhibit 3** is a true and correct copy of the January 23, 2014 Memorandum prepared by Alicia Lee.

6. Attached hereto as **Exhibit 4** is a true and correct copy of the February 10, 2014 FBI Report of the Interview with Karen Chon on February 7, 2014.

7. Attached hereto as **Exhibit 5** is a true and correct copy of the "Ryu and Chon Meeting transcription" bates numbered JR000517 through JR000524.

8. Attached hereto as **Exhibit 6** is a true and correct copy of the February 14, 2014 Handwritten Notes prepared by Lisa Pai.

9. Attached hereto as **Exhibit 7** is a true and correct copy of the February 25, 2014 Investigation Narrative prepared by Orest Hamersky.

10. Attached hereto as **Exhibit 8** is a true and correct copy of the Complaint filed by Wilshire Bank in the District of New Jersey, under Docket Number 2:14-cv-01770 (the “Embezzlement Action”).

11. Attached hereto as **Exhibit 9** is a true and correct copy of the March 20, 2014 FBI Report of the Interview with Karen Chon on February 11, 2014.

12. Attached hereto as **Exhibit 10** is a true and correct copy of the March 28, 2014 Investigation Narrative prepared by Orest Hamersky.

13. Attached hereto as **Exhibit 11** is a true and correct copy of the June 23, 2016 Deposition of Karen Chon.

14. Attached hereto as **Exhibit 12** is a true and correct copy of the October 13, 2016 Deposition of Bo Young Lee.

15. Attached hereto as **Exhibit 13** is a true and correct copy of the July 13, 2017 Deposition of Lisa Pai.

16. Attached hereto as **Exhibit 14** is a true and correct copy of the August 18, 2017 Deposition of Lisa Pai.

17. Attached hereto as **Exhibit 15** is a true and correct copy of the September 29, 2017 Deposition of Alicia Lee.

18. Attached hereto as **Exhibit 16** is a true and correct copy of the December 17, 2017 Deposition of Frank Gleeson.

19. Attached hereto as **Exhibit 17** is a true and correct copy of the February 15, 2018 Deposition of Orest Hamersky.

20. Attached hereto as **Exhibit 18** is a true and correct copy of the March 14, 2018 Deposition of Karen Chon.

21. Attached hereto as **Exhibit 19** is a true and correct copy of the April 26, 2018 Order and Opinion of Judge Rakoff in the “Advancement Action” filed in the Southern District of New York, under Docket Number 1:18-cv-01236.

22. Attached hereto as **Exhibit 20** is a true and correct copy of the June 14, 2018 Deposition of James Ryu

23. Attached hereto as **Exhibit 21** is a true and correct copy of the November 9, 2018 Memorandum of Law in support of James Ryu’s Motion for Summary Judgment in the Embezzlement Action.

24. Attached hereto as **Exhibit 22** is a true and correct copy of the March 12, 2019 Order Denying Summary Judgment in Embezzlement Action.

25. Attached hereto as **Exhibit 23** is a true and correct copy of the March 21, 2019 Declaration of Lisa Pai, Esq.

26. Attached hereto as **Exhibit 24** is a true and correct copy of the March 22, 2019 Memorandum of Law filed in Support of Wilshire Bank’s Motion to Voluntarily Dismiss the Embezzlement Action.

27. Attached hereto as **Exhibit 25** is a true and correct copy of the April 10, 2019 Order Granting Wilshire Bank's Motion to Voluntarily Dismiss the Embezzlement Action.

I hereby declare that the foregoing statements made by me are true. I am aware that if any of the statements made by me are knowingly false, I may be subject to punishment.

Dated: August 28, 2020

/s/ ERIC W. MORAN

Eric W. Moran, Esq.